REMARKS/ARGUMENTS

Claims 1 through 17 remain in this application. Claims 1, 4, 8 through 10, 12 and 17 have been amended.

Claims 1, 4, 8 through 10, 12 and 17 are hereby amended to reference the mobile device using consistent language and to remove certain innocuous language. Approval of the amendments to these claims is respectfully requested.

Claims 1, 4, 9, 10, and 17 are rejected under 35 U.S.C. §102(e) as being unpatentable over U.S. Patent No. 6,185,204 to Voit ("Voit patent"). Applicants presume that claims 2, 3, 5 through 8, and 11 through 16 are also rejected under 35 U.S.C. §102(e) as being unpatentable over the Voit patent.

Claim 1 as amended provides, *inter alia*, assigning a long lived IP address and a user name to the mobile device in a wireless network, wherein the long lived IP address is included within the private IP address space of the private network; providing a server having an IP address within the private network and including a database having a cross reference between the user name and the long lived IP address for the mobile device; connecting the private network to the public network through a network address translator (NAT); initiating a push session between a push client in the public network and the mobile device by forwarding from the push client to the server the user name; retrieving and returning to the NAT the long lived IP address corresponding to the user name; and assigning a dynamic public IP address within the public IP address space of the public network that corresponds to the long lived IP address, thus the mobile.

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device, using an application level gateway that is associated with the NAT and returning the

dynamic public IP address to the push client. Accordingly, it is clear from claim 1 that the

private network uses private IP addresses, including the long lived IP address, and the public

network uses public IP addresses. Also, the public network is coupled to the private network by

way of the NAT and, thus, the private network is connected to the public network through the

NAT.

In contrast, the Voit patent describes an Internet communication system that looks-up an

IP address for a target mobile device at a DNS connected to the Internet, and the IP address is

then used to reach the target mobile device across the Internet. The DNS is queried by a call

originator with the name or number of the target mobile device and, then, returns an IP address to

the call originator. The Voit patent does not describe or suggest a target mobile device that is

reached through the DNS or any type of NAT, as required by claim 1. Also, the Voit patent

describes a system in which all addresses returned by the DNS are in the public address range.

Accordingly, the Voit patent does not describe or suggest any type of private network with a

private IP address space, as required by claim 1. Therefore, claim 1 distinguishes patentably

from the Voit patent.

Claim 10 as amended provides, *inter alia*, a server having an IP address within the private

IP address space of the private network that is accessible from the public network, the server

including a database having a cross reference between a user name and a long lived IP address

assigned to the mobile device, the long lived IP address being within the private IP address space

of the private network; a network address translator (NAT), coupled to the server, suitable for

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connecting the private network to the public network using address translation, the NAT

receiving the user name from a push client in the public network and forwarding the user name to

the server; and an application level gateway that is associated with the NAT and that, responsive

to the forwarding the user name, receives the long lived IP address from one of the server and the

mobile device and assigns a corresponding dynamic public IP address within the public IP

address space of the public network which is returned to the push client, thereby enabling the

push client to provide content to the mobile device using the dynamic public IP address. In

contrast, the Voit patent does not describe or suggest any type of private network with a private

IP address space, as required by claim 10. Therefore, claim 10 distinguishes patentably from the

Voit patent.

Claim 17 as amended provides, *inter alia*, a server, a NAT coupled to the server, and an

application level gateway associated with the NAT (similar to claim 10) and further provides a

second push client with an IP address inside the private IP address space of the private network

arranged and constructed to push services to the mobile device using the long lived IP address

wherein one of said server, said NAT, and said ALG operate to insure preferential access to the

mobile device from the second push client. In contrast, the Voit patent does not describe or

suggest any type of private network with a private IP address space, as required by claim 17.

Also, the Voit patent does not describe or suggest one push client in the public network and

another push client in the private network, as required by claim 17. Therefore, claim 17

distinguishes patentably from the Voit patent.

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Claims 2 through 9 and 11 through 16 depend from, and include all limitations of,

independent claims 1 and 10, respectively. Therefore, claims 2 through 9 and 11 through 16

distinguish patentably from the Voit patent for the reasons stated above for claims 1 and 10.

In view of the above, reconsideration and withdrawal of the rejection of claims 1 through

17 are respectfully requested.

CONCLUSION

No amendment made was related to the statutory requirements of patentability unless

expressly stated herein. Also, no amendment made was for the purpose of narrowing the scope

of any claim, unless Applicants have argued herein that such amendment was made to distinguish

over a particular reference or combination of references.

The Commissioner is hereby authorized to deduct any additional fees arising as a result of

this response, including any fees for Extensions of Time, or any other communication from or to

credit any overpayments to Deposit Account No. 50-2117.

It is submitted that the claims clearly define the invention, are supported by the

specification and drawings, and are in a condition for allowance. Applicants respectfully request

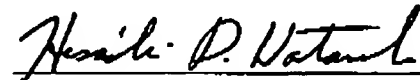that a timely Notice of Allowance be issued in this case. Should the Examiner have any

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questions or concerns that may expedite prosecution of the present application, the Examiner is

encouraged to telephone the undersigned.

Respectfully submitted,
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